

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

OUSMANE BAH,

Plaintiff,

-against-

APPLE INC., SECURITY INDUSTRY
SPECIALISTS, INC., JOHN WOODRUFF,
Individually and as an employee of SECURITY
INDUSTRY SPECIALISTS, INC., DETECTIVE
JOHN REINHOLD, in his individual capacity as a
detective for the NEW YORK POLICE
DEPARTMENT, JOHN DOES 1-3, unidentified
officers of the NEW YORK POLICE
DEPARTMENT, and CITY OF NEW YORK,
by and through THE NEW YORK POLICE
DEPARTMENT,

Defendants.

Docket No. 1:19-cv-03539-PKC

**DECLARATION OF KATIE L. VIGGIANI IN SUPPORT OF DEFENDANT
APPLE INC.'S MOTION TO DISMISS THE SECOND AMENDED COMPLAINT**

I, Katie L. Viggiani, hereby declare as follows, under penalty of perjury:


1. I am a member in good standing of the New York Bar and am admitted to practice in this District. I am an associate with the law firm of Morrison & Foerster LLP, counsel for Defendant Apple Inc. ("Apple").
2. I submit this declaration in support of Apple's Motion to Dismiss the Second Amended Complaint (the "Motion") in the above-captioned matter, to put before the Court a document referred to in the Motion.

3. Attached as Exhibit 1 is a true and correct copy of a redline comparison of the First Amended Complaint, (ECF No. 24-1), and the Second Amended Complaint, (ECF No. 85), which was rendered on October 13, 2020, using document comparison software called Workshare Compare.

Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the foregoing statements made by me are true and correct.

Dated: October 13, 2020
New York, New York

Respectfully submitted,


Katie L. Viggiani